

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ANDRICA CAGE, as Personal
Representative of the ESTATE OF
SAMUEL STERLING, (*deceased*),

Plaintiff,

v.

BRIAN KEELY, in his individual capacity,
and the UNITED STATES OF AMERICA,

Defendants.

Case No: 1:25-cv-00089

Hon. Hala Y. Jarbou
Chief United States District Judge

Hon. Maarten Vermaat
United States Magistrate Judge

STIPULATION TO EXTEND DEFENDANTS'
DEADLINE TO RESPOND TO PLAINTIFF'S COMPLAINT

Plaintiff and Defendants, Brian Keely, in his individual capacity, and the United States of America, stipulate and agree to extend Defendants' deadline to respond to Plaintiff's complaint through May 15, 2025. In support of their stipulation, the parties state as follows:

1. Plaintiff initiated this action on January 25, 2025. (Compl., ECF No. 1, PageID.1–14.)

2. Defendant, the United States of America, filed a certification confirming that Brian Keely was, at the time of the incident giving rise to Plaintiff's claims, acting within the scope of a federal office or employment with the United States Marshals Service. (Cert., ECF No. 7, PageID.22–23.)

3. As a result of the certification, the Court entered an order substituting the United States of America in place of Brian Keely with respect to Plaintiff's tort claims against Keely.

(Order, ECF No. 9, PageID.27.)

4. Defendant, Brian Keely, requested representation in this action from the U.S. Department of Justice, which has not yet been decided. A brief extension of time is necessary for the Department of Justice representation request to be processed and to ensure that there is sufficient time after that determination for Mr. Keely's counsel to prepare a response to the complaint.

5. An extension of the deadline will conserve party and judicial resources.

6. Defendants, therefore, seek additional time to prepare their respective responses to Plaintiff's complaint, and the parties agree to an extension through May 15, 2025.

Respectfully submitted,

Dated: April 1, 2025

/s/ Ven R. Johnson (with permission)

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Dated: April 1, 2025

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Dated: April 1, 2025

/s/ Carolyn Almassian

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**ORDER EXTENDING DEFENDANTS' DEADLINE
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Upon consideration of the parties' stipulation to extend Defendants' deadline to respond to Plaintiff's complaint,

THE COURT HEREBY ORDERS that Defendants' deadline to answer or respond to Plaintiff's complaint is extended to May 15, 2025.

Dated: April 1, 2025

/s/ Hala Y. Jarbou
HALA Y. JARBOU
Chief United States District Judge